

February 18, 2015  
Via US ECFS

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street S.W.  
Washington, D.C. 20554

RE: Puretalk Holdings, LLC  
Form 499 Filer ID: 828716  
Annual Customer Proprietary Network Information Compliance Certification;  
EB Docket No. 06-36

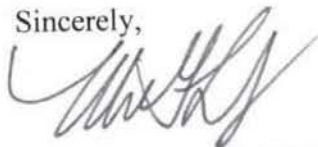
Dear Ms. Dortch,

Enclosed for filing is the Annual Customer Proprietary Network Information ("CPNI")  
Compliance Certification; EB Docket No. 06-36, filed on behalf of Puretalk Holdings, LLC.

Please do not hesitate to contact me at 407-260-1011 or [mark@csilongwood.com](mailto:mark@csilongwood.com) if you have any  
questions or concerns.

Thank you for your assistance in processing this filing.

Sincerely,



Mark G. Lammert, CPA  
Tax Preparer for Puretalk Holdings, LLC

cc: Puretalk Holdings, LLC  
file: Puretalk Holdings, LLC- PUC - FCC

**PURETALK HOLDINGS, LLC'S ANNUAL 47 C.F.R. §64.2009(e) CUSTOMER  
PROPRIETARY NETWORK CERTIFICATION FOR CALENDAR YEAR 2014**  
**EB Docket 06-36**

1. Date filed: 2/19/15
2. Filed on behalf of Puretalk Holdings, LLC, form 499 Filer ID: 828716
3. Signatory: Norman Klugman, Chief Operating Officer
4. Certification:

I, Norman Klugman, certify that I am an officer of Puretalk Holdings, LLC, ("Purtalk") and, acting as an agent of the Company, that I have personal knowledge that the Company has established operating procedures adequate to comply with the Commission's CPNI rules, 47 C.F.R. §64.2001 *et seq.* Included in this filing is a statement explaining how Puretalk's procedures ensure compliance with the Commission's CPNI requirements. Puretalk has not taken any actions against any data brokers in the past year. Puretalk has not received any CPNI-related customer complaints for 2014.

Signed: Norman Klugman, Chief Operating Officer of Puretalk

Date: 2/17/2015

1. Puretalk Holdings, LLC ("Puretalk") has established practices and provides adequate to ensure compliance with the requirements of Section 222 of the Communications Act of 1934, as amended and with the FCC's rules regarding Customer Proprietary Network Information ("CPNI"), set forth at 47 C.F.R. §64.2001 et seq. Puretalk's policy is to not use CPNI for any activity other than permitted by law.
2. Puretalk safeguards against pretexting, taking reasonable measures to protect against attempts to gain unauthorized access to CPNI. Puretalk is committed to notifying the FCC of any new or unusual methods of pretexting it discovers and any actions it takes against pretexters and data brokers.
3. Puretalk follows industry-standard practices to prevent unauthorized access to CPNI by a person other than the subscriber or Puretalk. However, in the event of an unauthorized attempt to access, use, or disclose personally identifiable information:
  - A. Puretalk would provide notification of the breach within seven (7) days to the United States Secret Service ("USSS") and the Federal Bureau of Investigation ("FBI").
  - B. Puretalk would wait an additional seven (7) days from its government notice prior to notifying the affected customers of the breach.
  - C. Notwithstanding the provisions in subparagraph B above, Puretalk would not wait the additional seven (7) days to notify its customers if Puretalk determines there is an immediate risk of irreparable harm to the customers.
  - D. Puretalk will maintain records of discovered breaches for a period of at least two (2) years.
4. All employees having access to CPNI are trained to understand what CPNI is, when they are and are not authorized to use or disclose CPNI, when customer consent must be required for CPNI use in marketing campaigns, and how to keep records regarding the receipt of such consent, customer complaints on CPNI and the use of CPNI for marketing.

Puretalk employees are required to review Puretalk's CPNI practices and procedures. They are informed that failure to comply with these practices and procedures may result in disciplinary action up to and including termination.

5. Puretalk may use CPNI for the following purposes:
  - To initiate, render, maintain, repair, bill and collect for services;
  - To protect its property rights; or to protect its subscribers or other carriers from fraudulent, abusive, or the unlawful use of, or subscription to, such services;

- To provide inbound telemarketing, referral or administrative services to the customer during a customer initiated call and with the customer's informed consent.
- To comply with applicable law.
- To market additional services to customers that are within the same categories of service to which the customer already subscribes;
- To market services formerly known as adjunct-to-basic services; and
- To market additional services to customers with the receipt of informed consent via the use of opt-in or opt-out, as applicable.

## 6. Customer Approval and Informed Consent

Puretalk has in place a system to obtain approval and informed consent from its customers prior to the use of CPNI for marketing purposes.

- Puretalk obtains opt-in or opt-out customer consent prior to using its customers' CPNI;
- Puretalk informs customers of their right to restrict the use, disclosure of and access to their CPNI prior to solicitation for approval;
- Customers' approval or disapproval remains in effect until the customers revokes or limits such approval or disapproval;
- Records of approvals are retained for at least one year;
- Puretalk uses oral notice to obtain limited, one-time approval for use of CPNI for the duration of an in-bound call.

7. Puretalk maintains, for at least one year, a record of all marketing campaigns that use Puretalk's customers' CPNI. The record will include a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as part of the campaign.

These policies and procedures have been reviewed and approved by Puretalk's corporate officers.